

# COMPLAINT

(for filers who are prisoners without lawyers)

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2018 MAR -2 P 1:18

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
STEPHEN C. DRIES  
CLERK

(Full name of plaintiff(s))

Elenora Kurzfeld-Milshcheyn

v.

(Full name of defendant(s))

Taycheedah Correctional facility.  
HSU Medical

Case Number:

**18-C-0325**

(to be supplied by Clerk of Court)

## A. PARTIES

1. Plaintiff is a citizen of WISCONSIN and is located at  
(State)

751 County Rd K P.O. Box 3100 Fond Du Lac, WI 54936  
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Taycheedah Correctional Institution  
(Name)

is (if a person or private corporation) a citizen of Wisconsin  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Taycheedah Correctional Facility  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

The plaintiff Elenora Klurfeld-Milshstein is an inmate  
at Taycheedah Correction Institution in Wisconsin.  
As she was trying to get down from her top bunk, she  
fell off, causing injuries to her lower back, thigh, and  
right heel on September 13, 2017. According to DOC  
and HSU policy, you must be 5 feet to be on an upper  
bunk. The plaintiff is only 4'11". HSU failed to report  
Klurfeld as a lower bunk restriction and therefore  
the guards in the Assessment and Evaluation  
Building placed her on a top bunk.

C. JURISDICTION

☐ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☒ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ 750,000.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I would like to be compensated a money award  
for pain and suffering

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E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 23 day of February 2018.

Respectfully Submitted,

  
\_\_\_\_\_  
Signature of Plaintiff

622664  
\_\_\_\_\_  
Plaintiff's Prisoner ID Number

Taucheedah Correctional Institution  
P.O. Box 3100, Fond Du Lac, WI 54936  
\_\_\_\_\_  
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE**



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.